

FILED BY *[Signature]* D.C.UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA 2001 FEB 27 PM 3:31Case No. 00-6258-CR-FERGUSON

Clerk of Court, S.D. of Fla-FTL

UNITED STATES OF AMERICA)
)
)
)
v.)
)
)
)
HAMLET VARGAS, and)
LIDIA ESTER RAMOS,)
)
Defendants.)
)

**GOVERNMENT'S SUPPLEMENTAL RESPONSE
TO STANDING DISCOVERY ORDER**

The United States of America hereby files this supplemental response to the Standing Discovery Order issued in this case. This supplemental response is numbered to correspond to that Order.

A. 1. There were telephone conversations and meetings recorded during the investigation. Attached please find a transcript for a meeting recorded on August 24, 2000.

5. Books, papers, documents, etc., which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected by making an appointment with undersigned counsel. Such items include, but are not limited to, the following, copies of which are attached: see A.1.

B. The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made to pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

H. The government has advised the defendant Ramos prior to trial of its intent, if any, to introduce during its case in chief proof of evidence pursuant to F.R.E. 404(b). You are hereby on notice that all evidence made available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in

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the trial of this cause, under F.R.E. 404(b) or otherwise. See attached DEA-6 report dated November 19, 1997.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

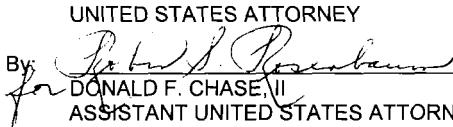
In addition to the request made above by the government pursuant to both Section B of the Standing Discovery Order and Rule (16)b of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the of the offense were:

1. Date: On or about August 23 and 24, 2000
Place: Pembroke Lakes Mall, Pembroke Pines, Florida; Swayne Plumbing at 6299 Johnson Street, Hollywood, Florida; Raymond's Grocery Store at 6301 Johnson Street, Hollywood, Florida; and 3361 SW 38 Street in Hollywood, Florida.

Respectfully submitted,

GUY A. LEWIS

UNITED STATES ATTORNEY

By: 
for DONALD F. CHASE, II
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 26th day of February 2001 to Joaquin Perez, Esquire, and Nelson Rodriguez, Esquire, 6780 Coral Way, Miami, Florida 33155.


for *Donald F. Chase, III*
DONALD F. CHASE, III
ASSISTANT UNITED STATES ATTORNEY